

Joyce Weaver Johnson  
Assistant Municipal Attorney  
Municipal Attorney's Office  
P.O. Box 196650  
Anchorage, Alaska 99519-6650  
Phone: (907) 343-4545  
Fax: (907) 343-4550  
E-mail: uslit@muni.org

Attorney for Defendants  
Municipality of Anchorage  
Anchorage Police Department  
Walt Monegan  
Officers Voss and Henikman

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ALASKA**

CAROLYN MITCHELL,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
ANCHORAGE POLICE DEPARTMENT and	)	
the MUNICIPALITY OF ANCHORAGE, a	)	
municipal corporation, WALTER MONEGAN,	)	
Officer HENIKMAN, and Officer J. VOSS,	)	
	)	
Defendants.	)	Case No. 3:05-cv-00273-JWS
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**STIPULATION FOR PROTECTIVE ORDER**

The parties, through their respective counsel, hereby agree and stipulate to limit production, reproduction and disclosure of certain Anchorage Police Department documents, specifically listed below, to Plaintiff and her counsel alone. Plaintiff and her counsel will not produce, reproduce or disclose any of the listed documents to anyone.

This stipulation bars producing, reproducing and disclosing the listed documents to, *inter alia*, Plaintiff's family, friends, consultants, witnesses and expert witnesses. Plaintiff and her counsel shall in no manner copy, disclose, cause to be disclosed, or permit to be disclosed any of the listed documents.

**Bases for This Stipulation.**

The bases of this Stipulation for Protective Order are Plaintiff's discovery requests to Walt Monegan and the Municipality of Anchorage and Defendants' concerns about the risks that would follow from disclosure. Specifically, Defendants believe that the Anchorage Police Department's Operational Procedures merit court protection because of the risk that lawbreakers will gain prior knowledge of police techniques, and to permit police personnel to carry out law enforcement work without undue interference or increased hazard to the public or the officers.

**Limitations on Use of Listed Documents.**

The parties also stipulate that if Plaintiff or her counsel wish to refer to any listed document in a pleading, motion, exhibit, or otherwise in this matter, she will submit such document to this Court under seal for its review and decision as to whether and, if so, how she might use such document in the matter without unduly risking redisclosure.

In the event Plaintiff wishes to use any listed document in a deposition, she will instruct the Court Reporter to designate the record "confidential" and to transcribe the confidential portions on a separate record with the documents utilized also included and marked "confidential."

In the event Plaintiff wishes to use any listed document in any fashion at trial, she will so move *in limine* pursuant to the applicable Federal Rules of Civil Procedure.

**Return of Documents to Municipal Attorney.**

All parties agree that these documents are produced only under the terms of this Stipulation for Protective Order, and shall not be used, or referred to, in any other litigation. All listed documents, in their original form as produced pursuant to the stipulated Order, shall be returned to the Office of the Municipal Attorney at the conclusion of this case.

**Documents Subject to This Stipulation.**

This Stipulation for Protective Order addresses the following listed documents and the contents thereof:

*Operational Procedure 3.07.020, In Custody Transports*, portions that may be pertinent to restraint without transport, responsive to Requests for Production to Monegan Nos. 3 and 22, *inter alia*.

*Operational Procedure 3.07.005, Response to Resistance*, portions that generally address safeguarding suspects as well as treatment of prisoners, pertinent to restraint, responsive to Requests for Production to Monegan Nos. 3, 4 and 22 and Requests for Production to Municipality of Anchorage No. 25, *inter alia*.

*Operational Procedure 3.07.030, Weapons*, portions responsive to Requests for Production to Monegan No. 4 and Requests for Production to Municipality of Anchorage Nos. 17, 22 and 23, *inter alia*.

*Operational Procedure 3.02.020, Arrests – General*, portions pertinent to investigative stops and search and seizure, responsive to Requests for Production to Monegan Nos. 5, 6, 23 and 24 and Requests for Production to Municipality of Anchorage Nos. 17, 21, 24, 25 and 27, *inter alia*.

*Operational Procedure 3.02.015, Custody – Field Interviews*, portions responsive to Requests for Production to Monegan Nos. 5, 6, 23 and 24 and Municipality of Anchorage Nos. 17, 21, 24, 25 and 27, *inter alia*.

*Operational Procedure 3.02.005, Custody – General*, portions responsive to Requests for Production to Monegan Nos. 17, 21, 24 and 27, *inter alia*.

Respectfully submitted this 18<sup>th</sup> day of January, 2007.

By: s/ Moshe C. Zorea (consent given)  
Co-Counsel for Carolyn Mitchell  
7540 E. 17<sup>th</sup> Avenue  
Anchorage, Alaska 99504  
Phone: (907) 337-7741  
Fax: (907) 337-2737  
E-mail: moshez@clearwire.net  
Alaska Bar No. 8406055

Respectfully submitted this 18<sup>th</sup> day of January, 2007.

By: s/ Isaac Derek Zorea (consent given)  
Co-Counsel for Carolyn Mitchell  
PO Box 210434  
Anchorage, Alaska 99521  
Phone: (907) 830-1385  
Fax: (907) 677-3779  
E-mail: eyedz@gci.net  
Alaska Bar No. 00-11090

Respectfully submitted this 18<sup>th</sup> day of January, 2007.

JAMES N. REEVES  
Municipal Attorney

By: s/ Joyce Weaver Johnson  
Municipal Attorney's Office  
P.O. Box 196650  
Anchorage, Alaska 99519-6650  
Phone: (907) 343-4545  
Fax: (907) 343-4550  
E-mail: uslit@muni.org  
Alaska Bar No. 9306029

The undersigned hereby certifies that on 1/18/07 a true and correct copy of the *Stipulation for Protective Order & Proposed Order* was served on:

**Isaac D. Zorea**  
**Moshe C. Zorea**

by first class regular mail, if noted above, or by electronic means through the ECF system as indicated on the Notice of Electronic Filing.

s/ Sheri Curro  
Sheri Curro, Legal Secretary  
Municipal Attorney's Office